

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

International Watchman, Inc.)	CASE NO. 1:13-CV-1986 PAG
)	
Plaintiff,)	DISTRICT JUDGE GAUGHAN
v.)	MAGISTRATE JUDGE WHITE
)	
The NATO Strap Co., <i>et al.</i> ,)	
)	
Defendants/Counterclaimants)	
)	
v.)	
)	
Ronald E. Sabo, Jr.)	
Counterclaim-Defendant)	

**STIPULATED FINAL ORDER FOR PERMANENT INJUNCTION
AND VOLUNTARY DISMISSAL AS TO DEFENDANT STRAPPED FOR TIME, INC.**

NOW COME Plaintiff, International Watchman, Inc.

(“IWI”), Defendant/Counterclaimant Strapped for Time, Inc. (“Strapped”), and Counterclaim-Defendant Ronald E. Sabo, Jr. (“Sabo, Jr.”), and advise the Court that this matter has been settled and thereby stipulate, subject to the Court’s approval, to the full and complete dismissal of this action, including claims, counterclaims and cross-claims as between and among IWI, Strapped and Sabo, Jr.

By stipulation of the parties and being advised of the premises, the Court finds that:

1. The parties have settled their dispute;
2. In settlement of their dispute, Strapped acknowledges that:
 - a. IWI is the owner of all rights, title and interest in United States Trademark Registration No. 3,907,646 for the mark NATO® and U.S. Trademark No. 4,093,914 for the mark NATO G-10®, each for watches, watch bands and straps;

- b. IWI's U.S. Trademark Registration No. 3,907,646 on NATO is valid; and
- c. IWI's U.S. Trademark Registration No. 4,093,914 on NATO G-10 is valid.

3. In settlement of their dispute, Strapped further agrees that it will refrain from using the aforesaid trademarks in association with its line of ballistic nylon military style watch straps.

4. In settlement of their dispute, Strapped consents to entry of a final judgment for permanent injunction without further notice, and agrees that this Court shall retain jurisdiction over it for the purpose of implementing and enforcing the same.

NOW, THEREFORE, it is accordingly ORDERED, ADJUDGED and DECREED that:

1. The Court has jurisdiction over this action pursuant to 15 U.S.C. § 1125(a) and 28 U.S.C. § 1367(a).

2. Strapped has consented to entry of a judgment for injunctive relief pursuant to 15 U.S.C. § 1116 to prevent it from engaging in infringing conduct subject to penalty under 17 U.S.C. § 1125(a).

3. Strapped, and any of its subsidiaries and divisions, as well as its officers, directors, employees, agents and , are permanently enjoined and restrained from using IWI's Trademark Registrations No. 3,907,646 and No. 4,093,914 in association with Strapped's line of ballistic nylon military style watch straps for so long as the same remain valid and in force.

4. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, IWI's claims against Strapped are voluntarily dismissed with prejudice and Strapped's counterclaims against IWI are voluntarily dismissed with prejudice; and Strapped's crossclaims against Sabo, Jr. and Sabo, Jr.'s claims against Strapped are voluntarily dismissed with prejudice.

5. The parties waive any right to appeal from this Final Judgment and Order.

6. Each party will bear its/his own costs.

Dated: April 17, 2015

Strapped For Time, Inc.

By: s:/Ray L. Weber
Ray L. Weber (0006497)
Laura J. Gentilcore (0034702)
Renner, Kenner, Greive, Bobak, Taylor & Weber
106 South Main Street, Suite 400
Akron, OH 44308
Telephone: (330) 376-1242
Facsimile: (330) 376-9646
rlweber@rennerkenner.com
ljgentilcore@rennerkenner.com

Robert M. Ward
3455 Peachtree Road NE
Floor 5
Atlanta, GA 30326
Telephone: (404) 606-6480
Facsimile: (203) 220-8497
E-mail: rward@dilworthip.com

Attorneys for Defendant Strapped For Time, Inc.

Dated: April 17, 2015

International Watchman, Inc.

By: s:/David A. Welling
David A. Welling
davidw@choken-welling.com
C. Vincent Choken
vincec@choken-welling.com
Choken Welling LLP
55 S. Miller Road, Suite 203
Akron, Ohio 44333
Phone: (330) 865-4949
Fax: (330) 865-3777
*Attorneys for International Watchman, Inc. and
Ronald E. Sabo, Jr.*

IT IS SO ORDERED.

Dated: _____

The Honorable Patricia Gaughan

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2015, the foregoing stipulated dismissal was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s:/Ray L. Weber